IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE Peter M. Kranack

BANKRUPTCY NO. 15-23309-JAD

Debtor

CHAPTER NO. 13

Peter M. Kranack

Movant

Related to Docs. 80, 82, and 83

v.

U.S. Bank Trust National Association, as trustee Hearing Date: 4/14/21 @ 10:00 a.m. for CVP III Mortgage Loan Trust II

Respondent

VS

Ronda J. Winnecour, Trustee Additional Respondent

DEBTOR'S MOTION FOR CONTINUANCE OF HEARING SCHEDULED FOR APRIL 14, 2021

- Debtor incorporates by reference all of the averments in Trustee's Motion For
 Determining Mortgage Creditor Has Been Paid Per Plan And To Confirm Debtor
 Resumption Of Payments (hereinafter "Trustee's Motion"). Document 80
- 2. Debtor incorporates by reference all of the averments in Debtor's Response To Trustee's Motion For Determining Mortgage Creditor Has Been Paid Per Plan And To Confirm Debtor Resumption Of Payments (hereinafter "Debtor's Response"). Document 82
- Debtor incorporates by reference all of the averments in Debtor's Motion For ProductionOf Complete Loan History and Mortgage Payoff. (Document 83)
- **4.** A hearing regarding both the Trustee's Motion and the Debtor's Motion is scheduled for Wednesday, April 14, 2021 at 10:00.
- Debtor was provided with an updated loan history and a payoff figure on Monday, April
 2021.
- **6.** Debtor requires an additional 30 days to analyze the loan history.

- **7.** Respondent's Counsel, Maria D. Miksich, has no objection to a continuance of the hearing scheduled for April 14, 2021.
- **8.** Additional Respondent's Counsel, Owen W. Katz, Esq. has no objection to a continuance of the hearing scheduled for April 14, 2021.

Wherefore, the Debtor respectfully requests that the Court enter an Order continuing the hearing scheduled for April 14, 2021 at 10:00 for 30 days.

Date: April 9, 2021

/s/ Robert S. Shreve Akman & Associates, LLC 345 Southpointe Boulevard, Suite 100 Canonsburg, PA 15317 (724) 514-1001, ext. 513 rsshreve@akmanlegal.com